

NOW INTO COURT, through undersigned counsel come Plaintiffs CARLOS DOMINGUEZ ZEITLER and VILMA LLORET DE DOMINGUEZ and Defendants HENRIQUE RODRIGUEZ GUILLEN, SUELOPETROL CORPORATION, SUELOPETROL EXPLORACION Y PRODUCCION S.L., and SUELOTEC S.A. who respectfully move this Honorable Court for an order extending the deadline to hold mediation to April 12, 2023.

Under the current Scheduling Order dated January 31, 2023 [DOC 67] the deadline for mediation is March 31, 2023.

2.

The Parties agreed to conduct mediation before mediator Susan S. Soussan. Mediation was initially scheduled for March 15, 2023 but was rescheduled for April 12, 2023. The Parties agree to extend mediation through the end of April 2023.

3.

The granting of this Motion should not delay or otherwise unduly affect the progress of these proceedings.

4.

Undersigned counsel certifies that all Parties consent to this motion and the Mediation deadline proposed herein have been approved by all Parties to the litigation and there is no opposition to same.

WHEREFORE, premises considered, Parties respectfully request that the Court grant this Joint Motion to Extend Mediation Deadline through the end of April, 2023.

THIS the 31st day of March, 2023.

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Respectfully submitted,

**JONES WALKER LLP**

*/s/ Luis Enrique Cuervo*

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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March, 2023, a true and correct copy of the foregoing has been forwarded to counsel for parties in this matter.

/s/ Luis Enrique Cuervo

LUIS ENRIQUE CUERVO